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REMARKS

Claims 15-20 remain in this application, with claim 21 now cancelled. Applicants appreciate the examiner's withdrawal of the double patenting rejection of the claims.

Before proceeding to address the rejections, applicants will briefly summarize their invention to assist the examiner in better understanding the differences between applicants' invention and the art of record. As recited in claim 15 applicants simulate **bit accurate** film grain in an image block by a method that commences with the step of computing the average of the pixel values within the image block. Thereafter, applicants randomly select, as a function of the average value of the image block, a block of bit accurate film grain from among a pool of previously established locks of bit accurate film grain. The term "bit accurate", as used in reference to film grain simulation, describes film grain simulation results that have repeatability. In other, for the same values, the simulation process yields the same film grain simulation results.

35 U.S.C. § 112 Rejection of Claims 15 and 21

Claims 15 and now cancelled 21 stand rejected under 35 U.S.C. § 112, first paragraph, as failing to comply with the written description requirement because the claims recite subject matter not described in the specification. In particular, the examiner contains that the claims recite the feature of "randomly selecting" but the examiner does not find this feature in applicants' specification.

The recitation of "randomly selecting" finds ample support in applicants' specification. For example, applicants' specification, at page 3, lines 6-8 recites the following:

> A film grain block of M x N pixels is selected from among a pool of previously established blocks containing film grain as a function of the average value of the image block and a random number.

The selection of film grain block from a pool of previously established film grain blocks as a function of a random number constitutes "randomly selecting", as recited in claim 15 as well as independent apparatus claim 19.

The passage at Page 8, lines 14-25 of applicants' specification further describes the manner in which applicants select a film grain block from a pool of previously established

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film grain blocks as a function of a random number. As discussed above, such selection constitutes "randomly selecting", as recited in independent claims 15 and 19.

Thus, applicants' specification contains ample support for the phrase "randomly selecting" as recited in claims 15 and 19. Accordingly, applicants claims satisfy the requirements of 35 U.S.C. § 112, warranting withdrawal of this rejection of the claims.

35 U.S.C. 102(e) Rejection of Claims 15, 16, and 19

Claims 15, 16, and 19 stand rejected under 35 U.S.C. 102(e) as anticipated by US Published Application US2007/0058878 (Serial No. 10/572,820) in the name Cristina Gomila et al. In this regard, the examiner contends that the '878 published application, and particularly claim 1, discloses all of the features of applicants' claims 15, 16, and 19.

As discussed above, independent claims 15 and 19 both recite the feature of randomly selecting, as a function of the average value of the image block, a block of bit accurate film grain from among a pool of previously bit blocks of bit accurate film grain. The '878 published application, and particularly claim 1 in that application, makes no mention of bit-accurate film grain.

To make sure there is no misunderstanding as to what claim 1 of the '878 published application says, applicants have reproduced that claim below:

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1. A method for simulating film grain in an input image
block, comprising the steps of: (a) computing an
average value of at least one image parameter for the
block; (b) selecting a film grain block from at least
one previously established pool of film grain blocks
whose image parameter most closely matches the image
parameter of the input image block; (c) blending the
selected film grain block with the input image block.
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As the examiner should appreciate, claim 1 of the 878 published application says nothing about **bit accurate film grain** nor does claim 1 recite random selection as a **function of the average value of the image block**. Therefore, the examiner has not established a *prima facie* case of anticipation since the examiner has not shown the presence of each and every feature of applicants' claims 15, 16, and 19. Applicants respectfully request withdrawal of the 35 U.S.C. 102(e) rejection of these claims.

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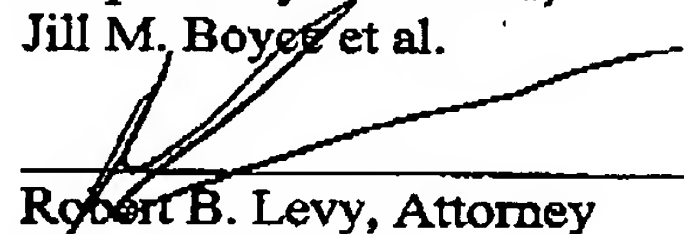Art Unit 2624

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Conclusion

In view of the foregoing, applicants solicit entry of this amendment and allowance of the claims. If the Examiner cannot take such action, the Examiner should contact the applicant's attorney at (609) 734-6820 to arrange a mutually convenient date and time for a telephonic interview.

No fees are believed due with regard to this Amendment. Please charge and fee or credit any overpayment to Deposit Account No. 07-0832.

Respectfully submitted,
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